



August 31, 2015

Federal Communications Commission
445 12th Street Southwest
Washington, DC 20554

**Re: Lifeline and Link Up Reform and Modernization, WC Docket No 11-42
Report and Order, and Memorandum Opinion and Order, FCC 15-71 (2nd FNPRM)**

Honorable Members of the Federal Communications Commission:

As Mayor of the City and County of San Francisco, I respectfully submit these comments to assist the Commission in its effort to ensure affordable Internet access for low-income consumers by modernizing the Lifeline program. Citizens across America depend on Internet connectivity for access to fundamental services and information, including educational and governmental resources. In California, the cost of connection was cited by 60 percent of respondents to a recent survey as the primary reason that our residents do not have Internet access at home. I commend the Commission for its continued commitment to the improvement of Lifeline, and ask that additional changes be made to thoughtfully update this critical program for the 21st century.

Just two weeks ago, San Francisco was pleased to announce a pilot of Comcast's Internet Essentials program for low-income seniors over the age of 65. The new program will offer low-cost Internet access to eligible seniors, along with additional training and discounted computers to provide older adults with the skills and tools necessary to connect online. This new effort will build on the work of SF Connected, a successful City-operated digital training program aimed at bringing online tools and skills to some of our most vulnerable residents. Data shows that that only 57 percent of California's seniors have Internet connection at home, compared to 81 percent of citizens statewide. This new pilot with Comcast has the opportunity to help close this considerable gap by addressing affordability with a fixed, low-rate service and by providing relevant training and low-cost equipment to those who need it most.

I am hopeful that efforts such as the Comcast Internet Essentials pilot will be successful in connecting more of our citizens with critical online tools and knowledge; however, the long-term sustainability of this and other broadband affordability services would greatly benefit from an expanded Lifeline offering. Accordingly, along with many fellow mayors across the country, I strongly support the Commission's initiative to include broadband as a service supported by the Lifeline program. I believe that the goal should be to achieve an affordable monthly rate of \$10 per month, similar to that provided through the Internet Essentials program and by AT&T's commitment as a condition of its recent merger with DirecTV.

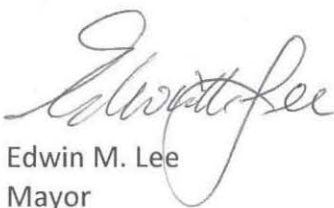
As the Commission has correctly noted, a compelling reason for supporting broadband through the Lifeline program is the pace at which government services continue to migrate online. San Francisco is a city that continually seeks to serve its residents more efficiently and effectively through digital services, and any gap in broadband access means reduced civic engagement and use of municipal services. The City is currently developing its Public Experience Strategy to create a digital presence with a detailed focus on public needs and that is fully integrated into departmental service strategies. We are also dedicated to further expanding the hugely successful SF Business Portal, our comprehensive web tool that brings together the complex information surrounding business registration, permits, and licenses into a single user-friendly City website. Efforts like these and the important benefits that come with them simply cannot reach enough of our citizens without expanded affordable broadband access.

I also support the Commission's proposal for creating an independent national Lifeline eligibility verifier, so long as the initiative does not supplant effective independent programs such as that administered by the California Public Utilities Commission (CPUC). The CPUC recently completed a thorough review and reform of its California LifeLine Program, which has successfully produced many of the improvements that the Commission is now considering, including the creation of independent verification and a firm definition of eligible services. Third-party administration should be pursued for states that do not have a program to protect against unacceptable abuses, but federal efforts should leave in place effective state programs that already achieve such goals.

Finally, I support the Commission's effort to increase competition for Lifeline consumers by increasing the number of providers offering service. There are several regional Internet Service Providers operating in San Francisco's low-income neighborhoods that could help provide more vigorous competition for Lifeline service. Similarly, the support should be available to providers administering service to public housing. The CPUC's California Advanced Services Fund – Public Housing Account program has successfully supported the capital costs for installing broadband networks in public housing. With access to Lifeline support, such programs would be able to cover operating expenses.

I applaud the Commission's ongoing efforts to update the Lifeline program. San Francisco depends on the Internet to provide fundamental services to its residents, including information on critical governmental resources. Robust support from our federal partners for the Lifeline program will allow cities across the country to bridge the digital divide and ensure that our diverse communities have access to the innovations of the 21st century.

Sincerely,



Edwin M. Lee
Mayor